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Attorneys for Plaintiff
Lisa Corson

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

<p>LISA CORSON,</p> <p>Plaintiff,</p> <p>v.</p> <p>POWER MOVES INC. and SHAWN PEREZ,</p> <p>Defendant.</p>	<p>Case No.: 1:19-cv-8847</p>
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DECLARATION IN SUPPORT OF MOTION FOR ALTERNATIVE SERVICE

I, R. Terry Parker, declare as follows:

1. I am the attorney for the plaintiff Lisa Corson (“Plaintiff”) in the above-captioned action.
2. The original complaint in the above-captioned action was filed on September 24, 2019.
3. The defendant Power Moves, Inc. was served through the New York Secretary of State with the summons and complaint on October 4, 2019.

4. Because the defendant Power Moves, Inc. did not answer or otherwise respond to the complaint, Plaintiff obtained a certificate for default from the Clerk on December 12, 2019.

5. On March 25, 2020, Plaintiff amended her complaint to add the president of the defendant Power Moves, Inc., Shawn Perez, as a defendant in his individual capacity.

6. On March 30, 2020, pursuant to Rule 4 of the Federal Rules of Civil Procedure, Plaintiff sent a request for waiver of service to Mr. Perez at the Power Moves, Inc. address, 1710 Broadway, New York, New York, 10019.

7. In addition, on April 3, 2020, Plaintiff sent a request for waiver of service to Mr. Perez's at 132 1st Street, Hicksville, New York 11801, having come to believe this address is a residence of Mr. Perez according to an online database.

8. Mr. Perez did not respond to Plaintiff's request for waiver of service.

9. In normal times, Plaintiff would have a process server attempt service of process at each of the addresses associated with Mr. Perez service until personal service is properly completed.

10. However, with the current outbreak of COVID-19, to attempt in person service of process is impracticable, if not dangerous and unlawful.

11. Plaintiff thus brings the current motion seeking permission to serve Mr. Perez by alternative means, namely, to effectuate service by registered mail to Mr. Perez at his place of business at 1710 Broadway, New York, New York, 10019 and his residence at 132 1st Street, Hicksville, New York 11801

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States.

Executed on this 18th day of May, 2020.

/s/ R. Terry Parker

R. Terry Parker

CERTIFICATE OF SERVICE

I, R. Terry Parker, hereby certify that I caused the foregoing document to be sent to the following by registered mail on the 18th day of May, 2020.

Power Moves Inc.
1710 Broadway
New York, New York 10019

Shawn Perez
1710 Broadway
New York, New York 10019

Shawn Perez
132 1st Street
Hicksville, New York 11801

/s/ R. Terry Parker

R. Terry Parker